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May 26, 2022

*Smith et al. v. Annucci et al.*  
1:21-cv-01715-RA [rel. 1:17-cv-07954-RA-OTW]

Dear Judge Wang:

Because Defendants were unable to complete document production by the **May 1, 2022** deadline in the Joint Case Management Plan (ECF No. 137) and continue to work on producing documents, the parties respectfully request an extension of the deadline to serve interrogatories, from **June 1, 2022** (the current deadline in the Joint Case Management Plan) to **September 1, 2022**. As described in our last joint status letter to the Court on **May 13, 2022**, there are also a number of outstanding issues related to document production about which the parties are still attempting to reach resolution. The parties will address those issues as ordered by the Court on **May 16, 2022** in a joint letter to be submitted no later than **June 10, 2022**.

Respectfully,

/s/ David M. Stuart

David M. Stuart  
Attorney for Plaintiffs

/s/ Andrew Blancato

Andrew Blancato  
Attorney for Defendants

The Honorable Ona T. Wang  
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VIA CM/ECF